

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JONATHAN MULLANE,

Plaintiff,

v.

MARY L. MORRISSEY and
THOMAS J. DONOVAN JR., in
their individual and official capacities,
and WASHINGTON COUNTY
CRIMINAL DIVISION BENCH
WARRANT NO. 11544,

Defendants.

DOCKET NO. 1:19-CV-10729-IT

FILED
IN CLERKS OFFICE
2019 JUL 24 PM 12:16
U.S. DISTRICT COURT
DISTRICT OF MASS.

**PLAINTIFF'S MOTION FOR LEAVE TO SUBMIT A
SUPPLEMENTAL AUTHORITY IN SUPPORT OF THE PENDING MOTION FOR
RECONSIDERATION [ECF 42]**

COMES NOW Plaintiff Jonathan Mullane (hereinafter, "Plaintiff") and respectfully moves this Honorable Court for leave to submit a notice of supplemental authority in support of his pending Motion for Reconsideration [ECF 42]. For the convenience of the Court, a proposed iteration is annexed hereto as **EXHIBIT 1**.

In support of the instant motion, Plaintiff shows unto the Court as follows:

1. On or about **July 8, 2019**, via first-class mail, Plaintiff submitted a motion for reconsideration to this Court and renewed request for oral argument. See ECF 42.
2. "Good cause" exists for the instant motion because, *inter alia*, the persuasive authority in question, styled Nandjou v. Marriott Int'l, Inc., Civil Action No. 18-cv-12230-ADB, 2019 U.S. Dist. LEXIS 112310 (D. Mass. **July 8, 2019**) (**Burroughs, D.J.**), was not available until after Plaintiff's submission of the said motion for reconsideration on the same day.

3. Nandjou, *supra*, addresses how this Court must apply specific personal jurisdiction, and appears to directly contradict this Court's interpretation of specific personal jurisdiction in its order of dismissal [ECF 40, 41].
4. In Plaintiff's pending motion for reconsideration [ECF 42], Plaintiff contends *inter alia* that specific personal jurisdiction is satisfied in the case at bar.

CONCLUSION

WHEREFORE, Plaintiff prays that this Honorable Court grant leave to submit the annexed proposed notice of supplemental authority.

Respectfully submitted,



JONATHAN MULLANE,
Plaintiff (*pro se*)
60 Clyde Street, Unit #1
Somerville, MA 02145
Tel.: (617) 800-6925
j.mullane@icloud.com


DATED: July 22, 2019

CERTIFICATE OF SERVICE

I, JONATHAN MULLANE, hereby certify that on July 22, 2019 I served copies of the foregoing PLAINTIFF'S MOTION FOR LEAVE TO SUBMIT A SUPPLEMENTAL AUTHORITY IN SUPPORT OF THE PENDING MOTION FOR RECONSIDERATION [ECF 42] via first class mail, postage prepaid, to Defendants as specified below:

Terrance J. Hamilton, Esq.
Casner & Edwards LLP
303 Congress Street
Boston, MA 02210
Tel.: (617) 426-5900
tjhamilton@casneredwards.com

Jon T. Alexander, Esq.
Office of the Attorney General
109 State Street
Montpelier, VT 05609-1001
Tel.: (802) 828-1299
john.alexander@vermont.gov



JONATHAN MULLANE,
Plaintiff *pro se*
60 Clyde Street, Unit #1
Somerville, MA 02145
Tel.: (617) 800-6925
j.mullane@icloud.com